

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FORMER BL STORES, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. 1898, 1941, 2110, 2214**

**CERTIFICATION OF COUNSEL REGARDING JOINT STIPULATION ALLOWING  
APPLICATIONS FOR ADMINISTRATIVE EXPENSES OF META PLATFORMS, INC.  
AND HORIZON MEDIA LLC**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “Debtors”) hereby certify as follows:

1. On January 31, 2025, Meta Platforms, Inc. (“Meta”) filed its *Application for Allowance and Payment of Administrative Expense and Reservation of Rights* [Docket No. 1898] (the “Meta Application”), which, as set forth more fully therein, sought allowance and payment of an administrative expense for advertising services provided to the Debtors as a Critical Vendor (as defined in the Critical Vendor Order) during the Chapter 11 Cases in the amount of \$2,088,755.89 (the “Meta Administrative Expense”).

2. On February 5, 2025, Horizon Media LLC a/k/a Horizon, LLC (“Horizon” and,

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Former BL Stores, Inc. (9097); Former Management Stores of Ohio, LLC (7948); Consolidated Property Holdings, LLC (0984); Former Furniture Stores of Ohio, LLC (7868); Former Savings Stores of California, LLC (5262); Former Stores of Ohio, LLC (6811); Former Tenant Stores of Ohio, LLC (0552); Former Savings Stores of Ohio, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Former eCommerce Stores of Ohio, LLC (9612); and Former Low Cost Stores of Ohio, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

together with Meta, the “Movants”) filed its *Motion for Allowance and Payment of Administrative Claim* [Docket No. 1941] (the “Horizon Application” and, together with the Meta Application, the “Applications”), which, as set forth more fully therein, sought (among other things) allowance and payment of an administrative expense for advertising services provided to the Debtors during the Chapter 11 Cases in the amount of \$5,384,302.47 (the “Filed Horizon Administrative Expense”).

3. On February 27, 2025, the Bankruptcy Court entered its *Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures, and (III) Granting Related Relief, Including Notice and Filing Procedures* [Docket No. 2110, as amended by Docket No. 2214] (the “Administrative Expense Procedures Order”), which, among other things, established procedures for the allowance and payment of certain administrative expenses in the Chapter 11 Cases.

4. The Debtors and the Movants have engaged in good faith negotiations and have agreed to enter into a stipulation (the “Stipulation”) to resolve the Applications in light of the Administrative Expense Procedures Order.

5. A copy of the Stipulation is attached as Exhibit A to the proposed form of order (the “Proposed Order”), attached hereto as Exhibit 1.

6. Counsel to each of the Movants has reviewed the Proposed Order and has agreed to its entry.

*[Remainder of page intentionally left blank]*

WHEREFORE, the Debtors respectfully request that the Court enter the proposed order, substantially in the form attached hereto as **Exhibit 1**, at its earliest convenience.

Dated: October 21, 2025

**MORRIS, NICHOLS, ARSHT &  
TUNNELL LLP**

*/s/ Sophie Rogers Churchill*

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